

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER
DISTRICT JUDGE

Joe Briones

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF JOE BRIONES**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Joe Briones, on **June 30, 2021, at 9:00 a.m. EST/8:00 a.m. CST**, and continuing until completion, at **Days Inn by Wyndham Victoria, 6203 Dairy Road, Victoria, TX 77904**. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology, and should immediately notify the attorney contact for the deposition listed below to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Taryn W. Harper
GREENBERG TRAURIG, LLP
Terminus 200
3333 Piedmont Road, NE
Suite 2500
Atlanta, GA 30305
Telephone: (678) 553-1111
E-mail: harpert@gtlaw.com

Date: June 22, 2021

Respectfully submitted,

/s/ Taryn W. Harper
Taryn W. Harper
(GA State Bar No. 335174)
GREENBERG TRAURIG, LLP
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, GA 30305
Telephone: (678) 553-1111
Facsimile: (678) 553-2693
E-mail: harpert@gtlaw.com

*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Joe Briones to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on June 22, 2021:

Marlene J. Goldenberg, Esq. (counsel for Plaintiff Joe Briones)
Steve Faries, Esq. (counsel for Plaintiff Joe Briones)
Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)
Daniel A. Nigh, Esq. (via email)
Ruben Honik, Esq. (via email)
David Stanoch, Esq. (via email)
Conlee Whiteley, Esq. (via email)
Jessica Priselac, Esq. (via email)
Seth A. Goldberg, Esq. (via email)
Clem C. Trischler, Esq. (via email)
Sarah E. Johnston, Esq. (via email)

This 22nd day of June, 2021.

/s/ Taryn W. Harper
Taryn W. Harper
(GA State Bar No. 335174)
GREENBERG TRAURIG, LLP
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, GA 30305
Telephone: (678) 553-1111
Facsimile: (678) 553-2693
E-mail: harpert@gtlaw.com

*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*